

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

KATHERINE MOPPIN, as heir to the Estate  
of John Henry Johnson, deceased; and as  
Special Administrator of the Estate of John  
Henry Johnson, deceased,

Plaintiff,

vs.

NATIONAL FOOTBALL LEAGUE,

Defendant.

Case No.: 12-cv-04028-AB

**[PROPOSED] ORDER GRANTING  
STIPULATION TO AMEND COMPLAINT**

On December 19, 2013, Plaintiff and Defendant filed with the Court a Stipulation to Amend the Complaint to add an additional party, Evelyn Edine Lovetere, as surviving spouse of her deceased husband, John Lovetere, deceased.

**IT IS ORDERED THAT:**

1. Plaintiff is granted leave to file an Amended Complaint without prejudice to or waiver of any jurisdictional argument Plaintiff may wish to assert.
2. Defendant's consent to Plaintiff's amendment of the Complaint to add an additional plaintiff is without waiver of—and is with total reservation of—any of their defenses, arguments, and positions with regard to the Complaint, either as it currently exists or as amended, including but not limited to arguments concerning timeliness and limitations of actions, failure to state a claim, joinder and severance, or any other arguments.

DATED: \_\_\_\_\_, 2013

Hon. Anita B. Brody  
UNITED STATES DISTRICT JUDGE

By: \_\_\_\_\_